

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JOSE SANCHEZ

Case No. 3:18-MJ-451-BH

**FILED UNDER SEAL**

**MOTION FOR DETENTION**

The United States of America moves for the pretrial detention of Defendant **JOSE SANCHEZ** pursuant to 18 U.S.C. § 3142.

1. Eligibility of Case. This case is eligible for a detention order because it involves (A) a material witness in a criminal proceeding whose presence may become impracticable to secure by subpoena; and (B) (check all that apply):

- Crime of violence (18 U.S.C. §3156)
- Maximum sentence of life imprisonment or death
- 10 + year drug offense
- Felony, with two prior convictions in above categories
- Serious risk that defendant will flee
- Serious risk of obstruction of justice
- Felony involving a minor victim
- Felony involving a firearm, destructive device, or any other dangerous weapon

Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

Defendant's appearance as required

Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check all that apply):

Probable cause to believe defendant committed 10+ year drug offense or firearms offense,

Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

Previous conviction for "eligible" offense committed while on pretrial bond

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing,

At first appearance

After continuance of 3 days (not more than 3).

DATED this 6th day of July 2018.

Respectfully submitted,

ERIN NEALY COX  
UNITED STATES ATTORNEY

/s/ Rebekah Ricketts

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing will be served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on the 6th day of July 2018.

/s/ Rebekah Ricketts

Rebekah Ricketts  
Assistant United States Attorney